

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS

DRAFT CONDITIONAL MAJOR PERMIT NO. F-05-013

RED WING SHOE COMPANY

DANVILLE, KY 40422

MARCH 24, 2005

LINK SHUMAKER, REVIEWER

SOURCE I.D. # 21-021-00047

ACTIVITY # APE20030001

APPLICATION LOG # 55530

SOURCE A.I.# 382

GENERAL SOURCE DESCRIPTION:

Red Wing Shoe Company manufactures men's footwear at a rate of 200 pairs per hours. Emissions include glycol ether, hexane, MEK, toluene, VOCs, and Xylene. To preclude major source requirements the facility volunteers to take the enforceable limits of 2260 hours of operation per year. While 2260 is their maximum annual operating limit, the plant generally operates at 8 hr/day, 5 days/wk, and 50 wk/yr. This correlates to 2000 hr/yr. Operating in this scenario keeps Red Wing Shoe Company below major source thresholds for Hazardous Air Pollutants (HAPs) and other Regulated Air Pollutants (RAPs). Red Wing Shoe Company was issued a conditional major permit in August of 1998 and has applied for a renewal in February of 2003.

INDIVIDUAL UNIT, OPERATION OR ACTIVITY EMISSION AND OPERATING CAPS:

01 (01) Shoe Manufacturing

Monitoring Requirements:

The permittee shall monitor the amounts of all materials that are referenced in the spreadsheet submitted in the application and other chemical based materials used at the source. The permittee shall calculate the monthly and annual VOC and HAPs emissions

PLANT-WIDE EMISSION AND OPERATING CAPS:

The facility shall not operate more than 2260 hours/yr as calculated by a twelve-month rolling total.

Pursuant to 401KAR 52:030 Section (1), sourcewide emissions of VOCs and HAPs shall not equal or exceed the following limitations for a twelve-month rolling average:

- a. Sourcewide single HAP emissions shall not equal or exceed 9 TPY
- b. Sourcewide combined HAPs emissions shall not equal or exceed 22.5 TPY
- c. Sourcewide emissions of VOCs shall not equal or exceed 90 TPY

CREDIBLE EVIDENCE:

The permit described in this document contains provisions that require specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.